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August 16, 2023

**BY ELECTRONIC MAIL AND ECF**

The Honorable Colm F. Connolly, Chief Judge  
United States District Court  
J. Caleb Boggs Federal Building  
844 N. King Street, Unit 31  
Wilmington, Delaware 19801-3555

**Re: American Private Equity Partners II, LP, et al. v. Catherine  
E. Youngman - Case No. 22-302 (D. Del) (CFC)**

Dear Judge Connolly:

After many months of negotiating, I am pleased to report that the parties have now executed a global settlement agreement that will resolve all matters related to the above-referenced adversary proceeding. The cases will be dismissed upon the effective date of the Settlement, which is scheduled to occur in September, 2023.

We will keep the Court apprised of any developments and are available at the Court's convenience if it has any questions.

Respectfully,

/s/ Seth A. Niederman  
Seth A. Niederman (No. 4588)

cc (via email):

Laura Davis Jones, Esq.  
David M. Bertenthal, Esq.  
Peter J. Keane, Esq.  
Patricia L. Glaser, Esq.

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